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June 17, 2020

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz, Case No. 19-cv-3377-LAP***
Sealed Materials from *Giuffre v. Maxwell*, Case No. 15-cv-07433-LAP

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre in accordance with the Court's June 15, 2020, order (Doc. 134), and in response to Defendant's June 12, 2020, letter requesting a pre-motion conference to discuss his request for access to filings and discovery materials from *Giuffre v. Maxwell*, Case No. 15-cv-07433-LAP (Doc. 133). Defendant accurately characterizes Plaintiff's position: she does not oppose the Court granting Defendant access under the protective order in the *Maxwell* case ("Protective Order") to any discovery or other filings from that case that the Court deems relevant to the issues in dispute in this case.¹ If the Court deems that any discovery or filings from the *Maxwell* case are relevant to this case and orders their production, Plaintiff will of course comply with that Court order.

Plaintiff is endeavoring to work cooperatively with Defendant on all discovery-related matters, including by not opposing his request to access *Maxwell* filings and discovery. It is therefore deeply troubling that Defendant decided to characterize (indeed, mischaracterize) sealed material in a public filing, especially on a matter on which party agreement made the characterization gratuitous. Defendant's actions are particularly upsetting because Plaintiff has no opportunity to defend herself by correcting Defendant's mischaracterizations without also breaching the Protective Order. This is not the first time Defendant has disclosed, and mischaracterized, the contents of sealed material in a public filing. *See* Amended Counterclaims ¶ 23 (Doc. 127). Plaintiff therefore respectfully requests that the Court direct that any briefing on Defendant's proposed motion be filed under seal.

Respectfully,

s/ Charles J. Cooper
Charles J. Cooper

cc: Counsel of Record (via ECF)

¹ This is the Plaintiff's position in the *Giuffre v. Maxwell* matter as well. If the Court wishes Plaintiff to file a letter response in that matter as well she will do so upon the Court's direction.